

**Hill, Brian**

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**From:** Rachel Weiser <rachelmayweiser@gmail.com>  
**Sent:** Monday, May 06, 2013 10:36 AM  
**To:** Hill, Brian  
**Cc:** 'Robert Tolchin' (RJT@tolchinlaw.com); Mordechai Haller (hallermm@gmail.com); Dina Rovner (dsrovner@gmail.com); Hibey, Richard; Rochon, Mark  
**Subject:** Re: Sokolow v. PLO Addicott documents  
**Attachments:** Proposed Report Produced to Addicott.pdf; Media Appearances.doc; Public Speeches.doc; Awards.pdf

Brian --

As a supplement to Professor Addicott's productions, please see below for responses to your inquiries in **blue**:

Please be advised that plaintiffs object to the requests as vague, overbroad and unduly burdensome and produce their responses notwithstanding their objections.

Additionally, attached are copies of the awards Professor Addicott was able to locate and updated lists of media appearances and public speeches .

Thank you.

--Rachel

On Tue, Apr 23, 2013 at 4:59 PM, Hill, Brian <[BHill@milchev.com](mailto:BHill@milchev.com)> wrote:

(1) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 1, Defendants requested: "[a]ll documents and things relating to facts or data you considered in forming the opinions expressed in the Report that are not currently accessible at the websites listed in the footnotes to the Report." If the three documents produced at 1:06 p.m. today are the materials cited in footnotes 23m, 27 and 40 to Prof. Addicott's report, then Plaintiffs have satisfied this request.

**Plaintiffs have already produced all footnotes that you were having trouble locating.**

(2) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 2, Defendants requested: "[a]ll documents and things relating to facts or data you considered in forming the opinions expressed in the Report that are not cited in the report." Plaintiffs produced nothing in response to this request.

**Professor Addicott does not have anything responsive to this request that has not already been identified in his report.**

(3) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 3, Defendants requested: "[a]ll documents and things relating to any presentations or public speeches described in the Report, or Exhibits A or B to the Report, *that relate to the opinions expressed in the Report* including, but not limited to, *copies of presentations or public speeches or transcripts or audio-visual recordings of the presentations or public speeches*" (emphasis added). In response to this request,

Plaintiffs provided what you describe as a "copy of all public speeches" -- which was not actually a "copy" of his speeches, but a list of speeches. We did not ask for a list of Prof. Addicott's speeches, which we already had (as attached to his report at Exhibit B), and which is not responsive to the subpoena.

See 7 below.

(4) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 4, Defendants requested: "[a]ll documents and things relating to any presentations or media appearances described in the Report, or Exhibits A or C to the Report, *that relate to the opinions expressed in the Report* including, but not limited to *copies* of the presentations or media appearances or transcripts or audio-visual recordings of the presentations or media appearances" (emphasis added). In response to this request, Plaintiffs provided a list of Prof. Addicott's media appearances. We did not ask for a list of Prof. Addicott's media appearances, which we already had (as attached to his report as Exhibit C), and which is not responsive to the subpoena.

See 7 below.

(5) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 5, Defendants requested: "[a]ll documents and things relating to any of the books described in the Report, or Exhibit A to the Report, *that relate to the opinions expressed in the Report* including, but not limited to, *copies* of those portions of the books that relate to the opinions expressed in the Report" (emphasis added). In response to this request, Plaintiffs provided Prof. Addicott's CV. We did not ask for a copy of Prof. Addicott's CV, which we already had (as attached to his report as Exhibit A), and which is not responsive to the subpoena.

See 7 below.

(6) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 6, Defendants requested: "[a]ll documents and things relating to any of the book chapters described in the Report, or Exhibit A to the Report, *that relate to the opinions expressed in the Report* including, but not limited to, *copies* of any such chapters" (emphasis added). Again, in response to this request, Plaintiffs produced Prof. Addicott's CV, which we already had and which is not responsive.

See 7 below.

(7) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 7, Defendants requested: "[a]ll documents and things relating to any of the law journal articles, reviews, or essays described in the Report, or Exhibit A to the Report, *that relate to the opinions expressed in the Report* including, but not limited to, *copies* of any such law journal articles, reviews, or essays" (emphasis added). Again, in response to this request, Plaintiffs produced Prof. Addicott's CV, which we already had and which is not responsive.

**With respect to questions (3) - (7): The opinions in Professor Addicott's report are expressed throughout the 3000+ media interviews and over 600 public speeches he has given internationally, as well as in all of his publications. The report contains themes that he shares in the majority of his talks and publishings. There is no speech, presentation, appearance, or publishing devoted entirely to these topics, but all discuss the opinions in his report in some part. Professor Addicott cannot possibly pull them all out and send them, but the media interviews are all viewable at [www.stmarytx.edu/ctl](http://www.stmarytx.edu/ctl), and all of his publishings are publicly**

accessible. Professor Addicott does not write out his speeches/presentations, etc..., but those that have been recorded can be found at the above website as well.

(8) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 8, Defendants requested: "[a]ll documents and things relating to any prior testimony described in the Report *that relate to the opinions expressed in the Report* including, but not limited to, *transcripts* of the prior testimony and *audio-visual recordings* of the prior testimony" (emphasis added). Plaintiffs produced nothing in response to this request.

**Professor Addicott does not have anything in his possession that is responsive to this request.**

(9) In the subpoena at Attachment A, "Documents to be Produced", Paragraph 9, Defendants requested: "[a]ll documents and things reflecting any communication between you and Counsel relating to or reflecting: (a) you[r] compensation for the Report or any subsequent testimony; (b) facts or data that Counsel provided and that you considered in forming the opinions expressed in the Report; or (c) assumptions that Counsel provided and that you relied on in forming the opinions expressed in the Report." Plaintiffs produced nothing in response to this request.

**See attached report, which was produced by plaintiffs' consultants and provided to Professor Addicott. Professor Addicott does not have anything else responsive to this request.**

Thank you.

--Rachel